



David M. Garvin
Florida Bar Board Certified in Taxation
LLM, Tax

LAW OFFICES
DAVID M. GARVIN, P.A.
200 SOUTH BISCAYNE BOULEVARD, SUITE 3150
MIAMI, FLORIDA 33131
TELEPHONE (305) 371-8101
FAX (305) 371-8848

E-MAIL: ontrial2@gmail.com
WEBSITE: davidmgarvin.com

May 1, 2019

BY ECF

Honorable Edgardo Ramos
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

**Re: United States v. Mark S. Scott,
S6 17 Cr. 630 (ER)**

Dear Judge Ramos:

We are in receipt of a copy of the government's letter arguing that any extension of the deadline for filing pre-trial motions be deemed excludable time under the Speedy Trial Act. Mr. Scott objects to any portion of any extension of the deadline for filing pre-trial motions being deemed excludable time under the Speedy Trial Act. Mr. Scott affirmatively states that his request does not delay the trial in this cause in any way.

In view of the Government's argument, Mr. Scott hereby amends his request to the Court as follows:

1. Mr. Scott moves that the present due dates for pre-trial motions, responses and replies be extended 14 days. (This would mean pre-trial motions will be due on or before May 14, 2019.); and
2. The conference date shall remain June 15, 2019, as presently scheduled.

Mr. Scott continues to objects to any part of the extension being deemed excludable time. Mr. Scott respectfully requests this Honorable Court grant his amended motion for an extension of 14 days to file pre-trial motions.

Respectfully submitted,


David M. Garvin

cc: Government's counsel